#### LAW OFFICES

#### SCHWARTZ, WOODS & MILLER

SUITE 610, THE LION BUILDING

1233 20TH STREET, N.W.

WASHINGTON, D.C. 20036-7322

OF COUNSEL ROBERT A. WOODS

TAX COUNSEL MARK B. WEINBERG

LOUIS SCHWARTZ (1918 - 2004)

LAWRENCE M. MILLER STEVEN C. SCHAFFER MALCOLM G. STEVENSON TELEPHONE 202-833-1700
FACSIMILE 202-833-2351
WRITER'S INTERNET: schaffer@swmlaw.com
WRITER'S EXTENSION: 204

July 24, 2006

RECEIVED

Ms. Marlene H. Dortch, Secretary Federal Communications Commission The Portals Building, Room TW-B204 445-12th Street, S.W. Washington, D.C. 20554 JUL **2** 4 2006

Federal Communications Commission Office of Secretary

Re:

Stations WEDH-DT and WEDN-DT

FCC Files No. BPEDT-19990113KG and BMPEDT-20031008AAT

MB Docket No. 04-184 (Norwich, Connecticut)

MB Docket No. 03-15 1

Dear Ms. Dortch:

Connecticut Public Broadcasting, Inc. ("CPBI"), by counsel, files this response to the "Ex Parte Submissions" of American Broadcasting Companies, Inc. (ABC) and "Entravision Holdings, LLC (Entravision)" filed June 12, 2006 and July 5, 2006, respectively.

Without justification or leave, ABC has fired yet another volley in its never-ending fight against the proposal made by Connecticut Public Broadcasting in 2003 for the repurposing of DTV channels licensed to CPBI in Hartford and Norwich, Connecticut. Without justification or leave, Entravision has filed its own "support" for ABC's position.

The clear case for grant of the above-referenced applications, and for completion of the rulemaking, was placed before Commission staff during an ex parte meeting of May 23, 2006, and an appropriate ex parte notice was filed after the meeting by undersigned counsel.<sup>2</sup>

No. of Copies rec'd 0 + 1

<sup>&</sup>lt;sup>1</sup> FCC staff asked that a copy of the previous filing made by CPBI regarding the subject matter of the present filing be filed in Docket 03-15, and so this filing in rebuttal to filings of ABC and Entravision (as argued below unauthorized with respect to Docket 04-184) has also been lodged in this proceeding.

<sup>&</sup>lt;sup>2</sup> CPBI's filing was made with the advance approval of FCC staff, and so notwithstanding the "restricted" ex parte status of the Norwich rulemaking proceeding, the filing conformed to the ex parte rules, 47 C.F.R. Section 1.1204 (a)(10). In response to an email request from FCC staff, the ex parte notice was also filed electronically in MM Docket 03-15 (letter of undersigned counsel dated May 25, 2006). Neither ABC nor Entravision recites seeking or receiving staff approval for their filings, which therefore violate ex parte rules.

#### CPBI Followed the Rules in its DTV Channel Exchange Proposal

, ¥ , 3

CPBI filed its applications in 2003 for modification of Stations WEDH, Hartford, and WEDN, Norwich under the rules for DTV channel exchanges (DCE) adopted by the FCC in 1997, as clarified in 1998. The 1998 clarification provided for the exchanges of allotment on an intra-community, intra-market or intra-market basis "provided that the exchanges do not result in additional interference beyond our de minimus standard to other stations...". *Allocation Reconsideration* at 7477. The Commission intended these procedures to afford broadcasters "as much flexibility as possible." While the situation anticipated in most cases involved two or more licensees, nothing in the rules prohibited a single licensee from conducting an exchange of channels among its own stations. These rules have not been changed, and technical staff at the May 23, 2006 meeting confirmed these rules were the relevant rules to the processing and grant of pending applications.

In the application for use of Channel 45 by WEDH-DT, Hartford, CPBI demonstrated that no interference was caused beyond the de minimus amount permitted by the rules. That standard was clearly stated as "no more than an additional 2 percent of the population served by another station being subject to interference," 47 C.F.R. Section 73.622(c)(3). The station population values for DTV services contained in Appendix B of the Allocation Reconsideration Order were used for the analysis of the DTV channel exchange, and this analysis showed the interference created was permissible under the de minimis standard. The "DTVPLN" record for Station WABC-DT was analyzed and it was determined that the interference was only 1.238% of the baseline population. The "DTVPLN" used for Station WUVN (then call sign WHCT) was analyzed and it was determined that the interference was only 0.561% of the baseline population (See Exhibit One, attached, an excerpt from the application).

CPBI representatives at the May 23, 2006 meeting understood FCC technical staff to express agreement with the exchange applications' compliance with all FCC technical rules. Notwithstanding, following a discussion of the technical basis for the objections of ABC and Entravision, Media Bureau management expressed a hope that ABC, Entravision and CPBI could present a settlement proposal for approval. CPBI's representatives understood that engineers for ABC in attendance at the meeting would establish contact for the purpose of exchanging information regarding the reasons why

In re Advanced Television Systems and Their Impact upon the Existing Broadcast Services, Sixth Report and Order, MM Docket No. 87-268, 12 FCC Rcd 14588 (1997) as modified by Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order, MM Docket No. 87-268, 13 FCC Rcd 7418, 7477-78, ¶ 146 (1998)(Allocation Reconsideration).

<sup>&</sup>lt;sup>4</sup> "Technical Statement" of du Treil, Lundin & Rackley, Inc., June 9, 2003, Figure 4. Following a change in the transmission plant, CPBI submitted an amendment which similarly showed only de minimus interference to WABC-DT and WUVN-DT "Technical Statement" of du Treil, Lundin & Rackley, Inc., March 9, 2004, Figure 4. Interference to WUVN-DT remained the same and interference to WABC-DT increased slightly to 1.023 percent.

the technical showings presented so far to the FCC regarding Channel 45 in Hartford were invalid. Instead, ABC filed its unauthorized letter of June 12, 2006, containing restatements and rehashing of the same discredited technical arguments it had previously offered.

### The 0.1 Interference Standard Applicable to NCAs Do Not Apply to CPBI's DCE Applications

ABC argues that the proper standard to apply to these applications is the 0.1 NCA standard which applies to "Negotiated Channel Agreements (NCAs)," as permitted first by the FCC in 2005 pursuant to the Second Periodic DTV Review. ABC might be right had the FCC denied or dismissed CPBI's DTV channel exchange applications prior to the filing of DTV channel elections. But the FCC has left these applications pending, notwithstanding CPBI's efforts to secure grant. <sup>5</sup> ABC and Entravision filed their channel elections knowing that the CPBI applications were pending, and that those elections would be subject to FCC final action on those applications. The FCC staff has seemingly acknowledged this special circumstance in that it is considering ABC's extraordinary waiver request in connection with its contingent election of Channel 7 as its eventual DTV home – apparently the only licensee in the country which is being permitted to argue contingently for two channels.

The ability for licensees to elect Tentative Digital Assignments pursuant to NCAs was adopted as an alternative to the channel election process and incorporated into the FCC's multi-step channel election plan, with the end goal of establishing a post-transition DTV Table of Allotments.<sup>6</sup> The NCA policies have permitted the sale of channel rights by those incumbent "in-core" NTSC licensees which had been awarded "in-core" DTV channels. Needless to say, because NCA procedures were adopted after CPBI filed its applications pursuant to the DCE procedures, NCA policies cannot and should not be applied. CPBI deserves processing under the DCE rules - as they applied in 2004 and as they remain unchanged to date.

### Grant of the Channel Exchange Applications Was Assumed In the Submission of the Petition for Rulemaking for the Ultimate Assignment of Channel 9 in Norwich

ABC also addresses the Norwich rulemaking proceeding and states that "WEDN would no longer have any rights to channel 45" if it is granted. ABC has the wrong order of events. A simple review of the Petition for Rulemaking submitted by CPBI on January 9, 2004 shows that CPBI indicated its pending applications to exchange the DTV channels of WEDH and WEDN. CPBI reiterated the pendency of the channel exchange applications in its supporting comments of July 6, 2004 (footnote, page 2).

See "Response to 'Supplement to Objection' and 'Supplement to Informal Objection' filed October 17, 2005 by CPBI, and efforts recited at footnotes 11 and 12.

<sup>&</sup>lt;sup>6</sup> See Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, 19 FCC Rcd 18,279, at para. 45 (2004) ("Second Periodic Review Order").

Obviously, the Norwich proposal to utilize Channel \*9 depends on the compliance with FCC interference rules for DTV. The proposal was found acceptable by the Video Division in the Notice of Proposed Rulemaking in the docket (DA04-1318, para. 3), and whether it is \*9 substituted for \*45 or \*9 substituted for \*32 does not matter – the outcome is a superior use of spectrum by CPTV by deploying Channel \*45 at Hartford for Station WEDH and Channel \*9 at Norwich for Station WEDN.

### ABC Has Presented, and Entravision Has Relied Upon, Incorrect Engineering in its Three Presentations Regarding Station WUVN

ABC has argued that the use of DTV \*45 by Station WEDH, Hartford would cause prohibited interference to Station WUVN(TV), licensed to Entravision. The amount of interference has changed from 2.8% ("Objection to Digital Television Channel Allotment Exchange" filed by ABC on January 15, 2004); to 2.7% ("Supplement to Objection", filed by ABC on September 2, 2005); to 8.91% ("Ex parte Submission" on behalf of ABC of June 12, 2006). Entravision, by counsel, each time filed its own objections, without submitting any independent engineering analysis, but only relying on ABC's submissions. ("Informal Objection" of February 5, 2004; "Supplement to Informal Objection" of September 23, 2005; and "Ex Parte Submission" of July 5, 2006).

At the meeting, it seemed clear to CPBI representatives that Media Bureau technical staff understood the errors in ABC's submissions. CPBI asked its consulting engineer to prepare the attached Engineering Statement in the event there is still any doubt that ABC has been submitting incorrect information in its submissions with regard to Station WUVN. Although denied by ABC, the facts are that its studies in each case double-count the predicted interference to Station WUVN-DT. The attached Engineering Statement demonstrates that ABC has incorrectly determined that there is increased interference, and the Bureau should reject ABC's efforts to obfuscate the actual facts of the situation through its repetitive filing of incorrect information.

### Conclusion: CPBI Requires Immediate Relief and its Digital Channel Exchange Applications Should Be Granted.

As argued by CPBI in the meeting arranged by FCC staff, CPBI needs immediate relief. It has to make final arrangements for construction of both its Hartford DTV and relocated analog channels. The so-called "compromise" solution presented by ABC (Ex Parte Submission of June 12, p. 5) is no compromise at all...which explains why CPBI has not been approached in any way by ABC prior to its latest volley. Notwithstanding promises made at the ex parte meeting to explore the engineering basis of ABC's objection with CPBI's consulting engineer, nothing was done; instead, ABC has simply manufactured yet more faulty engineering, claiming yet more interference to Station WUVN, and filed its further unauthorized pleading.

CPBI stresses that its digital channel exchange proposal was filed in compliance with all FCC rules. It deserves to have those applications granted.

Respectfully submitted,

SCHWARTZ, WOODS & MILLER

Steven C. Schaffer

#### SCS/mkm

cc: Joyce Bernstein - FCC MB

Gordon Godfrey – FCC MB Eloise Gore - FCC MB

Barbara Kreisman – FCC MB

Andrew Long - FCC MB

Mary Beth Murphy - FCC MB

Clay Pendarvis - FCC MB

Nam Pham - FCC OET

Nazifa Sawez - FCC MB

Alan Stillwell - FCC OET

Kate Todryl - FCC MB

Barry Friedman, counsel to Entravision, Inc.

Kevin P. Latek, counsel to Meredith Corp.

Mark J. Prak, counsel to Hearst-Argyle Properties, Inc.

Susan L. Fox, VP, Government Relations, The Walt Disney Company

Tom W. Davidson, Akin Gump Strauss Hauer & Feld, LLP

#### **EXCERPT FROM**

"TECHNICAL EXHIBIT AMENDMENT
of
APPLICATION FOR CONSTRUCTION PERMIT
for
TELEVISION STATION WEDH-DT
HARTFORD, CONNECTICUT"
dated
March 9, 2004

submitted with FCC File No. BPEDT-19990113KG amendment of March 10, 2004.

### TECHNICAL EXHIBIT AMENDMENT OF APPLICATION FOR CONSTRUCTION PERMIT TELEVISION STATION WEDH-DT HARTFORD, CONNECTICUT

March 9, 2004

CHANNEL 45 465 KW (MAX-DA) 505 M

# TECHNICAL EXHIBIT AMENDMENT OF APPLICATION FOR CONSTRUCTION PERMIT TELEVISION STATION WEDH-DT HARTFORD, CONNECTICUT CHANNEL 45 465 KW (MAX-DA) 505 M

#### Summary of Domestic Allocation Analysis

	Stations Potentially Affected by Proposed Station								
Facility Number	Channel	Call	City State	Distance (km)	Status	Application Prefix	Application Reference Number		
1	30	WVIT	NEW BRITAIN CT	0.3	LIC	BLCT	19791113LC		
2	43	WSAH	BRIDGEPORT CT	44.6	LIC	BLCT	19871009KE		
3	44	WGBX-TV	BOSTON MA	148	LIC	BLET	20010103ABV		
4	44	WNYW-DT	NEW YORK NY	148	PLN	DTVPLN	DTVP1278		
5	44	WNYW	NEW YORK NY	143.4	APP	BMPCDT	19990402KI		
6	45	WMEA-DT	BIDDEFORD ME	252.7	PLN	DTVPLN	DTVP1302		
7	45	WABC-DT	NEW YORK NY	148	PLN	DTVPLN	DTVP1309		
8	45	WROC-DT	ROCHESTER NY	421	PLN	DTVPLN	DTVP1310		
9	45	WEWB-TV	SCHENECTADY NY	141.1	СР	ВРСТ	20020213AAL		

	Stations Potentially Affected by Proposed Station									
Facility Number	Channel	Call	City State	Distance (km)	Status	Application Prefix	Application Reference Number			
10	45	WEWB-TV	SCHENECTADY NY	141.2	LIC	BLCT	19850114KJ			
11	45	WOLFTV	HAZLETON PA	259.5	LIC	BPRM	20000413AAD			
12	45	WOLF-TV	HAZLETON PA	259.5	СР	BPCDT	19980825KI			
13	46	WHCT-DT	HARTFORD CT	8.4	PLN	DTVPLN	DTVP1321			
14	46	WWDP	NORWELL MA	151.1	LIC	BLCT	19970116KE			
15	48	WYDN	WORCESTER MA	102.1	LIC	BLET	20001226AAM			
16	49	WEDW	BRIDGEPORT CT	55.6	LIC	BLET	19870908KE			
17	53	WEDN	NORWICH CT	58.9	СР	ВРЕТ	20011003ABH			
18	53	WEDN	NORWICH CT	58.9	LIC	BLET	19860124KI			

	Summary of Interference Analysis for Worst-Case Scenarios									
Facility Number	Interference Population Before Analysis	Interference Population After Analysis	Baseline Population	Net Change in Interference	Percent of Baseline	Permissible Percent of Baseline	Result			
1		_			0.000		pass			
2	336538	338005	3020630	1467	0.049	0.05	pass			
3	468427	468427	5937857	0	0.000		pass			

Summary of Interference Analysis for Worst-Case Scenarios Interference Interference Facility Baseline Net Change in Permissible Percent Percent of Population Before Population After Result Population Number Interference Baseline of Baseline Analysis Analysis 4 520602 520602 18013319 0 0.000 pass 5 616808 616808 18013319 0 0.000 pass 6 29447 30542 647970 1095 0.169 2.0 pass 7 178527 361293 17865809 182766 2.0 1.023 pass 8 0.000 pass 9 3415 11566 1323548 8151 0.616 2.0 pass 2.0 10 2843 14607 1255921 11764 0.937 pass 2769938 2.0 11 400404 400404 0 0.000 pass 0.000 12 pass 2.0 13 268612 267525 3262860 -1087 -0.644 pass 14 0.000 pass 0.000 pass 15 3831205 589 0.015 pass 16 268232 268821 --1465797 0 0.000 2.0 pass 17 96645 96645 2.0 0 0.000 pass 164248 164248 1577540 18

Note: A grid cell resolution of 0.75 km, with a terrain sample of 0.5 km, was employed in the OET-69 analysis.

This Engineering Statement was prepared on behalf Connecticut Public Broadcasting, Inc. ("CPBI"), in support of an *Ex Parte* Submission in response to the same filed by American Broadcasting Companies, Inc. ("ABC") and Entravision Holdings, LLC to the CPBI application for WEDH-DT, Channel \*45, at Hartford, Connecticut (FCC File No. BPEDT-19990113KG) and related Petition for Rule Making for Channel \*9 at Norwich, Connecticut. It is demonstrated herein that the WEDH-DT proposal fully meets the FCC 2% and 10% *de minimis* criteria with respect to all relevant allotments and assignments. Furthermore, ABC's claims that the WEDH-DT application will result in new interference to WUVN-DT in excess of the FCC 2%/10% criteria is wrong because it based on incorrect calculations which have again "double-counted" predicted interference WUVN-DT.

#### Interference Analysis for WEDH-DT Proposal

An interference analysis was prepared for the WEDH-DT proposal, as amended, based on the FCC Office of Engineering and Technology Bulletin No. 69 ("OET-69"). As described in the WEDH-DT application, the analysis was based on a cell size of 0.75 km and a terrain increment of 0.5 km. The WEDH-DT proposal passes every station interference analysis and <u>fully meets</u> the FCC *de minimis* criteria with respect to <u>all</u> stations including WABC-DT and WUVN-DT.\* An excerpt of the output with respect to the WUVN-DT facility, as generated by the FCC OET-69 analysis software, based on the current FCC engineering database is attached hereto as Figure 1. As indicated on the last page of Figure 1, the worst-case new interference from the proposed WEDH-DT facility to WUVN-DT is -0.0333%. Therefore, the proposal passes the 2%/10% criteria with respect to WUVN-DT.

<sup>\*</sup> WUVN-DT is referenced by its original call sign when the FCC table of allotments was developed: WHCT-DT.

#### Flaw in ABC OET-69 Calculations

To further illustrate the point, an excerpt of the OET-69 analysis prepared in the <u>incorrect</u> manner is attached hereto at Figure 2. This incorrect analysis includes a NORWICH CT (BLEDT-20030425AAL) record in both the before and after studies. This record must be omitted from the interference analysis to produce a correct result. This is done at the beginning of the program input when it asks for records that should be ignored in the analysis.

But when this record is improperly included in the interference analysis, the program incorrectly determines that the WEDH-DT proposal fails the 2%/10% criteria with a worst-case new interference of 2.6021%. This incorrect result is illustrated at the bottom of Figure 2.

In sum, it appears that ABC is relying on an incorrect interference analysis to conclude that the WEDH-DT proposal fails the 2%/10% criteria; when, in fact, the WEDH-DT proposal fully passes the FCC 2%/10% *de minimis* criteria with respect to all relevant stations.

This statement was prepared by me or under my direction and it is true and correct to the best of my knowledge and belief.

Louis Robert du Treil, Jr., P.E.

Jon han fel

du Treil, Lundin & Rackley, Inc. 201 Fletcher Ave. Sarasota, Florida 34237

July 14, 2006

#### Correct FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

1990 Census data selected

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 07-11-2006 Time: 11:33:27

Record Selected for Analysis

WEDHDT USERRECORD-01 NORWICH CT US

Channel 45 ERP 465. kW HAAT 505. m RCAMSL 00604 m

Latitude 041-42-13 Longitude 0072-49-57

Status APP Zone 1 Border

Dir Antenna Make CDB Model 00000000065933 Beam tilt N Ref Azimuth 0.

Last update Cutoff date Docket

Comments Applicant

, 1 1 A

Cell Size for Service Analysis 0.8 km/side

Distance Increments for Longley-Rice Analysis 0.50 km

Facility meets maximum height/power limits

Azimuth	ERP	HAAT	41.0 dBu F(50,90)
(Deg)	(kW)	(m)	(km)
0.0	407.385	539.8	108.8
45.0	376.232	545.6	108.5
90.0	431.227	566.3	111.0
135.0	374.143	563.0	109.5
180.0	42.410	462.6	84.8
225.0	26.450	464.1	81.7
270.0	88.801	448.1	89.1
315.0	431.674	452.6	102.4

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

Proposed facility OK to FCC Monitoring Stations

A CONTRACTOR OF THE CONTRACTOR

#### Correct FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountian

Proposed facility is within the Canadian coordination distance Distance to border = 368.5km

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

\*\*\*\*\*\*\*\*\*\*\*\*\*

Start of Interference Analysis

Proposed Station

Channel

ARN

Call City/State WEDHDT NORWICH CT 4.5 USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	on Ref. No.
30	WVIT	NEW BRITAIN CT	0.3	LIC	BLCT	-19791113LC
43	WSAH	BRIDGEPORT CT	44.6	LIC	BLCT	-19871009KE
43	WSAH	BRIDGEPORT CT	44.6	APP	BPCT	-20060222AAG
44	WGBX-TV	BOSTON MA	148.0	LIC	BLET	-20010103ABV
44	WNYW-DT	NEW YORK NY	148.0	PLN	DTVPLN	-DTVP1278
44	WNYW	NEW YORK NY	143.4	CP MOD	BMPCDT	-19990402KI
45	WMEA-DT	BIDDEFORD ME	252.7	PLN	DTVPLN	-DTVP1302
45	WABC-DT	NEW YORK NY	148.0	PLN	DTVPLN	-DTVP1309
45	WROC-DT	ROCHESTER NY	421.0	PLN	DTVPLN	-DTVP1310
45	WCWN	SCHENECTADY NY	141.1	LIC	BLCT	-20040330AAX
45	WOLF-TV	HAZLETON PA	259.5	LIC	BLCDT	-20050906ACK
45	WOLFTV	HAZLETON PA	259.5	LIC	BPRM	-20000413AAD
46	$\mathtt{WHCT-DT}$	HARTFORD CT	8.4	PLN	DTVPLN	-DTVP1321
46	WWDP	NORWELL MA	151.1	LIC	BLCT	-19970116KE
48	WYDN	WORCESTER MA	102.1	LIC	BLET	-20001226AAM
49	WEDW	BRIDGEPORT CT	55.6	LIC	BLET	-19870908KE
53	WEDN	NORWICH CT	58.9	LIC	BLET	-20060106ABO

Analysis of Interference to Affected Station 13

DTV Baseline Analysis

Channel Call

City/State WHCT-DT HARTFORD CT

Application Ref. No. DTVPLN -DTVP1321

Stations Potentially Affecting This Station

Chan Call City/State

Dist(km) Status Application Ref. No.

#### Correct FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

45	WEDN-DT	NORWICH CT	59.8	PLN	DTVPLN	-DTVP1291
45	WABC-DT	NEW YORK NY	155.7	PLN	DTVPLN	-DTVP1309
45	QHMW	SCHENECTADY NY	137.4	PLN	DTVPLN	-NPLN1687
46	WHRC	NORWELL MA	146.8	PLN	DTVPLN	-NPLN1703
46	WBFF-DT	BALTIMORE MD	423.1	PLN	DTVPLN	-DTVP1329
46	WMTW-DT	POLAND SPRING ME	302.9	PLN	DTVPLN	-DTVP1330
46	WSKGTV	BINGHAMTON NY	261.8	PLN	DTVPLN	-NPLN1705
46	WFMZ-DT	ALLENTOWN PA	258.6	PLN	DTVPLN	-DTVP1339
47	WYDN-DT	WORCESTER MA	62.8	PLN	DTVPLN	-DTVP1362
47	ULNW	LINDEN NJ	155.7	PLN	DTVPLN	-NPLN1721

Results for: 46A CT HARTFORD	DTVPI	N DTVP1321	PLN
HAAT 299.0 m, ATV ERP 220.0	kW		
	POPULATION	AREA (sq km)	
within Noise Limited Contour	3789037	21300.0	
not affected by terrain losses	3598762	19549.4	
lost to NTSC IX	63789	372.8	
lost to additional IX by ATV	272113	1625.6	
lost to ATV IX only	312041	1905.4	
lost to all IX	335902	1998.4	

NTSC Baseline Analysis

Channel Call City/State
18 WHCTTV HARTFORD CT Application Ref. No. DTVPLN -NPLN1012

#### Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	on Ref. No.
15	WNYT-DT	ALBANY NY	131.3	PLN	DTVPLN	-DTVP0183
17	WMHT	SCHENECTADY NY	137.7	PLN	DTVPLN	-NPLN0998
17	WOST-DT	BLOCK ISLAND RI	90.0	PLN	DTVPLN	-DTVP0279
18	WMFP-DT	LAWRENCE MA	157.5	PLN	DTVPLN	-DTVP0307
18	WNJB-DT	NEW BRUNSWICK NJ	191.6	PLN	DTVPLN	-DTVP0317
18	WETMTV	ELMIRA NY	338.5	PLN	DTVPLN	-NPLN1026
18	WNPITV	NORWOOD NY	345.0	PLN	DTVPLN	-NPLN1027
18	WVTB-DT	ST. JOHNSBURY VT	319.4	PLN	DTVPLN	-DTVP0332
19	WCDCTV	ADAMS MA	100.5	PLN	DTVPLN	-NPLN1045
19	WGBH-DT	BOSTON MA	142.1	PLN	DTVPLN	-DTVP0356
20	WTXX	WATERBURY CT	33.8	PLN	DTVPLN	-NPLN1070
21	WLIW	GARDEN CITY NY	122.4	PLN	DTVPLN	-NPLN1120
21	WRNN-DT	KINGSTON NY	112.8	PLN	DTVPLN	-DTVP0450
21	WSBE-DT	PROVIDENCE RI	110.1	PLN	DTVPLN	-DTVP0455
22	WWLP	SPRINGFIELD MA	35.4	PLN	DTVPLN	-NPLN1144
22	WLIW-DT	GARDEN CITY NY	122.4	PLN	DTVPLN	-DTVP0499
25	WFXT	BOSTON MA	143.2	PLN	DTVPLN	-NPLN1247
25	WNYETV	NEW YORK NY	151.1	PLN	DTVPLN	-NPLN1254
26	WTWS	NEW LONDON CT	63.9	PLN	DTVPLN	-NPLN1268
26	WTEN-DT	ALBANY NY	137.5	PLN	DTVPLN	-DTVP0647
32	$\mathtt{WEDH}-\mathtt{DT}$	HARTFORD CT	0.4	PLN	DTVPLN	-DTVP0857
33	WFSB-DT	HARTFORD CT	0.4	PLN	DTVPLN	-DTVP0894

DTVPLN NPLN1012 PLN Results for: 18N CT HARTFORD

POPULATION AREA (sq km)

#### Correct FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

within Noise Limited Contour	3788517	21296.6
not affected by terrain losses	3481464	19029.6
lost to NTSC IX	344919	1357.0
lost to additional IX by ATV	224128	993.8
lost to all IX	569047	2350.8

Analysis of current record

Channel Call City/State
46 WHCT-DT HARTFORD CT Application Ref. No. DTVPLN -DTVP1321

#### Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	on Ref. No.
45	WEDN-DT	NORWICH CT	59.8	PLN	DTVPLN	-DTVP1291
45	WABC-DT	NEW YORK NY	155.7	PLN	DTVPLN	-DTVP1309
45	WCWN	SCHENECTADY NY	137.3	LIC	BLCT	-20040330AAX
46	WWDP	NORWELL MA	146.8	LIC	BLCT	-19970116KE
46	WBFF	BALTIMORE MD	423.1	CP	BPCDT	-19980803KR
46	WBFF-DT	BALTIMORE MD	423.1	PLN	DTVPLN	-DTVP1329
46	WMTW-TV	POLAND SPRING ME	283.9	LIC	BLCDT	-20050607ADJ
46	WMTW-DT	POLAND SPRING ME	302.9	PLN	DTVPLN	-DTVP1330
46	WSKG-TV	BINGHAMTON NY	262.0	LIC	BLET	-20040109ACN
46	WFMZ-DT	ALLENTOWN PA	258.6	PLN	DTVPLN	-DTVP1339
46	WFMZ-TV	ALLENTOWN PA	258.5	CP MOD	BMPCDT	-20041029AHC
47	WYDN	WORCESTER MA	143.0	LIC	BLEDT	-20050505ABL
47	WYDN-DT	WORCESTER MA	62.8	PLN	DTVPLN	-DTVP1362
47	ULNW	LINDEN NJ	155.7	CP	BPCT	-19991028AAN
45	WEDHDT	NORWICH CT	8.4	APP	USERRECORI	0-01

Total scenarios = 8

Result key: 1
Scenario 1 Affected station 13

Before Analysis

Results for: 46A CT HARTFORD		DTVPL	DTVP1321	PLN
HAAT 299.0 m, ATV ERP 2			7 D D 7 / 11	
	POPU	JLATION	AREA (sq km)	
within Noise Limited Cont	our 3	789037	21300.0	
not affected by terrain 1	losses 3	598762	19549.4	
lost to NTSC IX		61816	367.7	
lost to additional IX by	ATV 2	206796	902.6	
lost to ATV IX only	2	238909	1107.0	
lost to all IX	2	268612	1270.3	
Potential Interfering Stat:	ions Inclu	ded in abo	ove Scenario	1
46N MA NORWELL	BLCT	19970116	KE LIC	
46N NY BINGHAMTON	BLET	200401097	ACN LIC	
47N NJ LINDEN	BPCT	19991028	AAN CP	
45A NY NEW YORK	DTVPLN	DTVP1309	PLN	
46A ME POLAND SPRING	BLCDT	200506071	ADJ LIC	

Correct FCC OET-69 Ana	<u>iysis Outr</u>	out for WEDH-L	I with Kesp	ect to W
46A PA ALLENTOWN	DTVPLN	DTVP1339	PLN	
47A MA WORCESTER		20050505ABL		
		DTVP1291		
1371 01 11011111011	51.220	D1121071	1 211	
After Analysis				
Results for: 46A CT HARTFOR	:D	DTVPLN	DTVP1321	PLN
HAAT 299.0 m, ATV ERP	220.0 kW			
		OPULATION ARE	A (sq km)	
within Noise Limited Con	tour	3789037 2	1300.0	
not affected by terrain lost to NTSC IX	losses	3598762 1	.9549.4	
lost to NTSC IX		61816	367.7	
lost to additional IX by				
lost to ATV IX only		236265	1446.0	
lost to all IX		267525	1621.7	
			_	
Potential Interfering Stat	ions Inc	luded in above	Scenario	1
46N MA NORWELL	BLCT	19970116KE	LIC	
	BLET			
47N NJ LINDEN	BPCT	19991028AAN		
45A NY NEW YORK	DTVPLN	DTVP1309		
46A ME POLAND SPRING	BLCDT	20050607ADJ	LIC	
		DTVP1339		
47A MA WORCESTER	BLEDT			
45A CT NORWICH	USERREC	ORD01	APP	
Percent new IX = -0.0333%  Result key: 2 Scenario 2 Affected Before Analysis		13		
Deloic Finalysis				
Results for: 46A CT HARTFOR HAAT 299.0 m, ATV ERP		DTVPLN	DTVP1321	PLN
	P	OPULATION ARE	EA (sq km)	
within Noise Limited Con			21300.0	
not affected by terrain	losses	3598762	19549.4	
lost to NTSC IX lost to additional IX by		61816	367.7	
lost to ATV IX only		310426		
lost to all IX		332561	1977.5	
Potential Interfering Stat	ions Inc	luded in above	Scenario	2
46N MA NORWELL	BLCT	19970116KE	LIC	
46N NY BINGHAMTON	BLET	20040109ACN		
47N NJ LINDEN	BPCT	19991028AAN		
45A NY NEW YORK	DTVPLN	DTVP1309	PLN	
46A ME POLAND SPRING	BLCDT	20050607ADJ	LIC	
46A PA ALLENTOWN	DTVPLN	DTVP1339	PLN	
47A MA WORCESTER	DTVPLN	DTVP1362	PLN	
45A CT NORWICH	DTVPLN	DTVP1291	PLN	

#### Correct FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

After Analysis				
Results for: 46A CT HARTFORD		OTVDI	N DWWD1221	PLN
HAAT 299.0 m, ATV ERP 2			N DTVP1321	PLIN
HAAT 299.0 m, ATV ERP 2			AREA (sq km)	
within Noige Limited Cont		OPULATION	21300.0	
within Noise Limited Cont not affected by terrain 1	lour	3598762	19549.4	
lost to NTSC IX	105565	61816	367.7	
lost to additional IX by	υπα			
lost to ATV IX only	AI V	306910	2192.6	
lost to all IX		330670	2296.2	
Potential Interfering Stati	ions Inc	luded in ab	oove Scenario	2
46N MA NORWELL	BLCT	19970116	KE LIC	
46N NY BINGHAMTON	BLET	20040109	ACN LIC	
47N NJ LINDEN	BPC <b>T</b>	19991028	BAAN CP	
45A NY NEW YORK	DTVPLN	DTVP1309	PLN	
46A ME POLAND SPRING	BLCDT	20050607	ADJ LIC	
46A PA ALLENTOWN	DTVPLN	DTVP1339	PLN	
47A MA WORCESTER	DTVPLN	DTVP1362	PLN	
45A CT NORWICH	USERREC	ORD01	APP	
Percent new IX = -0.0580%				
Result key: 3 Scenario 3 Affected Before Analysis	station	13		
Results for: 46A CT HARTFOR	D	DTVPI	LN DTVP1321	PLN
HAAT 299.0 m, ATV ERP 2	220.0 kW			
	P	OPULATION	AREA (sq km)	
within Noise Limited Cont			21300.0	
not affected by terrain	losses	3598762	19549.4	
lost to NTSC IX		61816	367.7	
lost to additional IX by	ATV		902.6	
lost to ATV IX only		240258		
lost to all IX		268612	1270.3	
Potential Interfering State	ions Inc	luded in al	oove Scenario	3
46N MA NORWELL	BLCT	1997011	6KE LIC	
46N NY BINGHAMTON	BLET	20040109	9ACN LIC	
47N NJ LINDEN	BPCT	19991028	BAAN CP	
45A NY NEW YORK	DTVPLN	DTVP130	9 PLN	
46A ME POLAND SPRING	BLCDT	2005060	7ADJ LIC	
46A PA ALLENTOWN	BMPCDT	2004102		
47A MA WORCESTER	BLEDT	2005050		
45A CT NORWICH	DTVPLN	DTVP129	1 PLN	

After Analysis

Results for: 46A CT HARTFOR HAAT 299.0 m, ATV ERP			DTVP1321	PLN
HAAT 299.0 M, ATV BAE		OPULATION A	AREA (sa km)	
within Noise Limited Con			21300.0	
not affected by terrain				
lost to NTSC IX	100000	61816	367.7	
lost to NTSC IX lost to additional IX by	ATV	205709	1254.0	
lost to ATV IX only		237614	1449.4	
lost to all IX		267525		
			•	
Potential Interfering Stat	ions Inc	luded in abov	e Scenario	3
46N MA NORWELL	BLCT	19970116KF	E LIC	
46N NY BINGHAMTON	BLCT BLET	20040109A0		
		19991028A	AN CP	
45A NY NEW YORK	DTVPLN	DTVP1309	PLN	
46A ME POLAND SPRING	BLCDT	20050607AI	J LIC	
45A NY NEW YORK 46A ME POLAND SPRING 46A PA ALLENTOWN	BMPCDT	20041029AI	HC CP	
47A MA WORCESTER				
		ORD01		
Percent new IX = -0.0333%				
referr new IX = -0.0333%				
Result key: 4				
Scenario 4 Affected	station	13		
Before Analysis				
Results for: 46A CT HARTFOR			DTVP1321	PLN
HAAT 299.0 m, ATV ERP				
	P	OPULATION 2	AREA (sq km)	
within Noise Limited Con	itour	3789037	21300.0	
not affected by terrain	losses			
lost to NTSC IX		61816	367.7	
lost to NTSC IX lost to additional IX by lost to ATV IX only	ATV	270745	1609.8	
		311775	1890.8	
lost to all IX		332561	1977.5	
Potential Interfering Stat	ions Inc	luded in abo	ve Scenario	4
46N MA NORWELL	RT.CT	19970116K	F T.T.C	
47N NJ LINDEN	BDCT	20040109A 19991028A	AN CP	
45A NY NEW YORK	DECT		PLN	
46A ME POLAND SPRING	BLCDT	20050607A		
	BMPCDT	20030007A		
46A PA ALLENTOWN 47A MA WORCESTER	DTVPLN	DTVP1362	PLN	
	DIVPLN	DTVP1291	PLN	
45A CT NORWICH	DIALTH	DIALITABL	T TITA	
After Analysis				
Results for: 46A CT HARTFOR				
	₹D	DTVPLN	DTVP1321	PLN
HAAT 299.0 m, ATV ERP		DTVPLN	DTVP1321	PLN

Correct FCC OE1-69 Anal	<u>ysıs Outr</u>	out for WEDH-	DI with Resp	bect to WUVN-
		2700027	01200 0	
within Noise Limited Con			21300.0	
not affected by terrain	ıosses		19549.4	
lost to NTSC IX	T. mrt T	61816	367.7	
lost to additional IX by	A.I.A	268854	1928.5	
lost to ATV IX only		308259	1928.5 2196.0	
lost to all IX		330670	2296.2	
Potential Interfering Stat	ions Inc.	luded in above	e Scenario	4
46N MA NORWELL	BLCT	1997011 <b>6</b> KE	LIC	
46N NY BINGHAMTON	BLET	00040100=0		
47N NJ LINDEN	BPCT	19991028AAN	CP	
		DTVP1309	PLN	
46A PA ALLENTOWN	BMPCDT	20050607AD3 20041029AH0	CP	
47A MA WORCESTER	DTVPLN	DTVP1362	PI.N	
45A CT NORWICH		ORD01	APP	
43A CI NORMICH	ODLINEC	ONDOI	ALL	
Percent new IX = $-0.0580$ %				
Result key: 5				
Scenario 5 Affected	station	13		
Before Analysis	000000			
502020 1027,520				
Results for: 46A CT HARTFOR	D	DTVPLN	DTVP1321	PLN
HAAT 299.0 m, ATV ERP	220.0 kW			
	P	OPULATION AF	REA (sq km)	
within Noise Limited Con-	tour	3789037	21300.0	
not affected by terrain	losses		19549.4	
not affected by terrain . lost to NTSC IX		61816	367.7	
lost to additional IX by	ATV		950.5	
lost to ATV IX only		245972	1157.7	
lost to all IX		272267	1318.2	
Potential Interfering Stat	ions Inc	luded in above	Scenario	5
46N MA NORWELL	BLCT	19970116KE	LIC	
46N NY BINGHAMTON	BLET	20040109ACN	1 LIC	
47N NJ LINDEN	BPCT	19991028AAN	N CP	
45A NY NEW YORK	DTVPLN	19991028AAN DTVP1309	PLN	
46A ME POLAND SPRING	DTVPLN	DTVP1330	PLN	
46A PA ALLENTOWN	DTVPLN	DTVP1339	PLN	
47A MA WORCESTER	BLEDT	20050505ABI		
45A CT NORWICH	DTVPLN	DTVP1291	PLN	
After Analysis				
Results for: 46A CT HARTFOR!	D	DTVPLN	DTVP1321	PLN
	220.0 kW			
	P	OPULATION A	REA (sq km)	
within Noise Limited Conf	tour	3789037	21300.0	
not affected by terrain	losses	3598762	19549.4	
lost to NTSC IX		61816	367.7	

Correct FCC OET-69 Analysis Of	utput for WEDH-DT with Respect to WUV
lost to additional IX by ATV	207555 1292.3 239193 1469.6
lost to ATV IX only lost to all IX	239193 1469.6
lost to all IX	2693/1 1659.9
Potential Interfering Stations I	ncluded in above Scenario 5
46N MA NORWELL BLCT	19970116KE LIC
46N NY BINGHAMTON BLET	20040109ACN LIC
ATTAL NOT TEMPORAL DOCUMENT	20040109ACN LIC 19991028AAN CP
45A NY NEW YORK DTVPL	N DTVP1309 PLN
45A NY NEW YORK DTVPL 46A ME POLAND SPRING DTVPL 46A PA ALLENTOWN DTVPL 47A MA WORCESTER BLEDT	N DTVP1330 PLN
46A PA ALLENTOWN DTVPL	N DTVP1339 PLN
47A MA WORCESTER BLEDT	20050505ABL LIC
45A CT NORWICH USERR	ECORD01 APP
Percent new IX = -0.0888%	
Result key: 6	
Result key: 6 Scenario 6 Affected stati	on 13
Before Analysis	
Results for: 46A CT HARTFORD	DTVPLN DTVP1321 PLN
HAAT 299.0 m, ATV ERP 220.0	RW DODGLAMION ADEA (or km)
N. I. C. W. C. L. T. C. Charles A. G. C. C.	POPULATION AREA (sq km)
within Noise Limited Contour not affected by terrain losses lost to NTSC IX	3/8903/ 21300.0
not affected by terrain losses	61014 267 7
TOST TO NISC IX	272246 1626 7
lost to additional IX by ATV	212041 1005 4
lost to additional IX by ATV lost to ATV IX only lost to all IX	312041 1905.4 334062 1994.4
iost to all ix	334002 1334.4
Potential Interfering Stations I	included in above Scenario 6
46N MA NORWELL BLCT	19970116KE LIC
46N NY BINGHAMTON BLET	20040109ACN LIC
47N NJ LINDEN BPCT 45A NY NEW YORK DIVPL	19991028AAN CP <sub>N</sub> DTVP1309 PLN
45A NY NEW YORK DTVPL	N DTVP1309 PLN
46A ME POLAND SPRING DTVPL	N DTVP1330 PLN
46A PA ALLENTOWN DTVPL 47A MA WORCESTER DTVPL	N DTVP1339 PLN
47A MA WORCESTER DTVPL 45A CT NORWICH DTVPL	N DTVP1362 PLN
45A CT NORWICH DTVPL	N DTVP1291 PLN
After Analysis	
Results for: 46A CT HARTFORD	DTVPLN DTVP1321 PLN
HAAT 299.0 m, ATV ERP 220.0	
·	POPULATION AREA (sq km)
within Noise Limited Contour	3789037 21300.0
not affected by terrain losses	3598762 19549.4
lost to NTSC IX	61816 367.7
lost to additional IX by ATV	268571 1936.4
lost to ATV IX only	304727 2187.5
lost to all IX	330387 2304.1

Potential Interfering Stat	ions Inc	luded in ak	oove Scenario	6
46N MA NORWELL	BLCT	19970116	SKE LIC	
		20040109		
		19991028		
45A NY NEW YORK	DTVPLN	DTVP1309	PLN	
45A NY NEW YORK 46A ME POLAND SPRING	DTVPLN	DTVP1330	) PLN	
46A PA ALLENTOWN	DTVPLN	DTVP1339	PLN	
47A MA WORCESTER				
		ORD01		
Percent new IX = -0.1126%				
Result key: 7				
Scenario 7 Affected	station	13		
Before Analysis	5000101	10		
Results for: 46A CT HARTFOR			LN DTVP1321	PLN
HAAT 299.0 m, ATV ERP				
	. P	OPULATION	AREA (sq km)	
within Noise Limited Con not affected by terrain	1	3789037	10540 4	
not affected by terrain	iosses	3598762	19549.4	
lost to NTSU IX	7.001	010461	307.7	
lost to additional ix by	AIV	210431	1161 1	
lost to NTSC IX lost to additional IX by lost to ATV IX only lost to all IX		24/321	1310 2	
lost to all in		212201	1,510.2	
Potential Interfering Stat	ions Inc	luded in a	oove Scenario	7
46n MA NORWELL	BLCT	19970110	6KE LIC	
47N NJ LINDEN	BPCT	20040109 19991028	BAAN CP	
		DTVP130		
46A ME POLAND SPRING 46A PA ALLENTOWN	BMPCDT	20041029	9AHC CP	
47A MA WORCESTER	BLEDT	20050505	5ABL LIC	
	DTVPLN	DTVP129:	l PLN	
After Analysis				
Results for: 46A CT HARTFOR	D	DTVP1	LN DTVP1321	PLN
HAAT 299.0 m, ATV ERP	220.0 kW			
·	P	OPULATION	AREA (sq km)	
within Noise Limited Con		3789037		
not affected by terrain		3598762	19549.4	
lost to NTSC IX		61816	367.7	
lost to additional IX by	ATV	207555	1292.3	
lost to ATV IX only		240542		
lost to all IX		269371	1659.9	
Potential Interfering Stat	ions Inc	luded in a	bove Scenario	7

Correct FCC OET-69 Anal	<u>ysıs Outr</u>	out for WEDH-	DI with Resp	ect to WU
460 47 1000		10070116***		
46N MA NORWELL	BLCT			
		20040109ACN		
47N NJ LINDEN	BPCT	19991028AAN	I CP	
45A NY NEW YORK 46A ME POLAND SPRING	DTVPLN	DTVP1309	PLN	
		20041029AHC		
		20050505ABI		
45A CT NORWICH	USERREC	ORDU1	APP	
Percent new IX = -0.0888%				
Result key: 8				
Scenario 8 Affected	station	13		
Before Analysis				
•				
Results for: 46A CT HARTFOR			DTVP1321	PLN
HAAT 299.0 m, ATV ERP			OEA (oo km)	
within Noise Limited Con	+ n	OPULATION AF	21300.0	
within Noise Limited Con	tour	3/0903/		
not affected by terrain			19349.4	
lost to NTSC IX lost to additional IX by lost to ATV IX only	n m11	61816	367.7	
lost to additional IX by	A'I'V	313390	1020.7	
lost to ATV IX only		313390		
lost to all IX		334062	1994.4	
Potential Interfering Stat	ions Inc	luded in above	e Scenario	8
46N MA NORWELL	BLCT	19970116KE	LIC	
46N NY BINGHAMTON	BLET	20040109ACI	N LIC	
47N NJ LINDEN	BPCT	19991028AA	N CP	
		DTVP1309		
46A ME POLAND SPRING	DTVPLN	DTVP1330	PLN	
46A PA ALLENTOWN	BMPCDT	DTVP1330 20041029AH	C CP	
47A MA WORCESTER	DTVPLN	DTVP1362	PLN	
		DTVP1291		
After Analysis				
Results for: 46A CT HARTFOR			DTVP1321	PLN
HAAT 299.0 m, ATV ERP				
	P		REA (sq km)	
within Noise Limited Con		3789037	21300.0	
not affected by terrain	losses	3598762	19549.4	
lost to NTSC IX		61816	367.7	
lost to additional IX by	ATV	268571	1936.4	
lost to ATV IX only		306076	2190.9	
lost to all IX		330387	2304.1	
Potential Interfering Stat	ions Inc	luded in abov	e Scenario	8
s Chi Ma NODSITT	DI CM	19970116KE	LIC	
46N MA NORWELL	BLCT	20040109AC		
46N NY BINGHAMTON	BLET BPCT	19991028AA		
47N NJ LINDEN	DPC1	1 <i>999</i> 1020AA	TA CE	

#### Correct FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

45A NY	NEW YORK	DTVPLN	DTVP1309	PLN
46A ME	POLAND SPRING	DTVPLN	DTVP1330	PLN
46A PA	ALLENTOWN	BMPCDT	20041029AHC	CP
47A MA	WORCESTER	DTVPLN	DTVP1362	PLN
45A CT	NORWICH	USERRECORI	001	APP

Percent new IX = -0.1126%

Worst case new IX -0.0333% Scenario 1

\*\*\*

FINISHED FINISHED FINISHED FINISHED FINISHED

#### Incorrect FCC OET-69 Analysis Output for WEDH-DT with Respect to WUVN-DT

1990 Census data selected

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 07-11-2006 Time: 12:02:26

Record Selected for Analysis

WEDHDT USERRECORD-01 NORWICH CT US

Channel 45 ERP 465. kW HAAT 505. m RCAMSL 00604 m

Latitude 041-42-13 Longitude 0072-49-57

Status APP Zone 1 Border

Dir Antenna Make CDB Model 00000000065933 Beam tilt N Ref Azimuth 0.

Last update Cutoff date Docket

Comments Applicant

Cell Size for Service Analysis 0.8 km/side

Distance Increments for Longley-Rice Analysis 0.50 km

Facility meets maximum height/power limits

Azimuth	ERP	HAAT	41.0 dBu F(50,90)
(Deg)	(kW)	(m)	(km)
0.0	407.385	539.8	108.8
45.0	376.232	545.6	108.5
90.0	431.227	566.3	111.0
135.0	374.143	563.0	109.5
180.0	42.410	462.6	84.8
225.0	26.450	464.1	81.7
270.0	88.801	448.1	89.1
315.0	431.674	452.6	102.4

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete